



APR 17 2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Paul Freeman
Executive Vice President
Mt. Carmel Cogeneration, Inc.
P.O. Box 409
Marion Heights Road
Marion Heights, PA 17832

Dear Mr. Freeman:

The United States Environmental Protection Agency (EPA), hereby requires the Mt. Carmel Cogeneration, Inc. ("Mount Carmel") to perform emission testing pursuant to EPA's authority under Section 114 of the Clean Air Act (CAA or the Act), 42 U.S.C. Section 7414.

Pursuant to Section 114(a) of the Act, 42 U.S.C. 7414(a), the Administrator of EPA provides or authorized representative of the Administrator may require, for the purpose of determining whether any person is in violation of, among other things, any implementation plan, standard of performance or emission standard, that any person who owns or operates any emissions source, on a one-time, periodic or continuous basis: establish and maintain records; make reports; install, use and maintain monitoring equipment and use audit procedures or methods; sample emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe); keep records on control equipment parameters, production variables or other indirect data; submit compliance certifications; and, provide such other information as may reasonably be required. Authority to require submittal of information pursuant to Section 114 of the Act has been delegated to the Director of the Air Protection Division of EPA Region III.

Mount Carmel Cogeneration, Inc. is the owner and operator of emission sources as specified in Section 114(a) of the Act. The information sought by this request is necessary for U.S. EPA to determine whether Mount Carmel Cogeneration, Inc. is in compliance with its permit limits and the applicable provisions of the Pennsylvania State Implementation Plan (SIP) in regard to emission rate standards of pollutants being emitted into the ambient air.

EPA requires Mt. Carmel to submit a pre-test protocol in response to the following requests no later than thirty (30) calendar days after receipt of this letter. EPA requires that Mt. Carmel report any changes or revisions to the information supplied within seven (7) days after the change or revision is made; this requirement to provide EPA with changed or revised information shall remain in effect until EPA provides Mt. Carmel with written notice of its termination.

1. Conduct emission testing for total particulate matter (TPM) [including filterable particulate matter (FPM, EPA Method 5 or approved alternative) and condensable particulate matter (CPM, EPA Method 202 or approved alternative)] at the stack outlet of the circulating fluidized bed (CFB) boiler [Source ID #031] at the Mt. Carmel Cogeneration, Inc. facility in Mount Carmel, PA.
2. A pre-test protocol shall be submitted to both the Pennsylvania Department of Environmental Protection (PaDEP) and U.S. EPA Regional Office in Philadelphia, Pennsylvania for the required testing for approval at least thirty (30) days prior to testing.
3. The pre-test protocol shall be approved by the U.S. Regional Office in Philadelphia, Pennsylvania prior to testing.
4. The pre-test protocol should go to both of the following State addresses in addition to the U.S. EPA Region III for review:

Muhammad Zaman, Northcentral Region Air Program Manager
Pa Department of Environmental Protection- Air Quality Program
208 West Third Street, Suite 101
Williamsport, Pennsylvania 17701

Charles Zadakis, Air Program Manager
Division of Source Testing and Monitoring
Rachel Carson State Office Building
P.O. Box 8468
Harrisburg, Pennsylvania 17105-8468

5. Mount Carmel must use the appropriate test methods as listed in the PaDEP's current Source Testing Manual. Collect the parametric data for the exhaust stack to produce an emission factor in terms of pounds pollutant per million British thermal units (lb/mmBtu) and pounds per hour (lb/hr) of operation. The CFB boiler must be operating at maximum normal operating conditions as specified in the Department issued Title V Operating Permit (TVOP-49-00001). Also, the testing must include soot-blowing as outlined in the National Stack Testing Guidance dated April 27, 2009, along with the Memorandums that were referenced therein. The test results shall be compared with any emission limitation for that pollutant in any enforceable permit.
6. Mount Carmel must conduct the test as outlined in the approved pre-test protocol within forty-five (45) days of EPA's approval.

7. The test report shall be submitted to the listed regulatory agencies within sixty (60) days of completion of the testing programs.

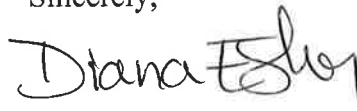
Failure to provide the information required may result in the issuance of an Order requiring compliance with the requirements, or the initiation of a civil action pursuant to Section 113 (b) of the Act, 42 U.S.C. Section 7413(b). In addition, Section 113(c)(2) of the Act provides that "any person who knowingly makes any false material statement, representation, or certification in, or omits material information from ... any ... document required pursuant to this Act ... shall upon conviction be punished by a fine pursuant to Title 18 of the United States Code, or by imprisonment for not more than two years, or both." The information you provide may be used by EPA in administrative, civil and criminal proceedings.

Please submit your response to the information and testing requirement to:

Mr. Edward Gerst
US EPA-Region III
Office of Air Enforcement and Compliance Assistance
Mail Code 3AP20
1650 Arch Street
Philadelphia, PA 19103

If you should have any questions regarding this requirement for information and testing, please contact Edward Gerst, of the APD staff, at (215) 814-3438 or Gerst.Edward@epa.gov. The requirement for submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Sincerely,



Diana Esher, Director
Air Protection Division

cc: Mr. Aaron Weaver, PaDEP- Northcentral Regional Office